
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

NOVELIS NORTH AMERICA - KINGSTON

CERTIFICATE
NUMBER

317

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

25 OCTOBER 2023

DATE OF EXPIRY

24 OCTOBER 2026

CERTIFIED SINCE

25 OCTOBER 2023

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a horizontal line.

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*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

Cold mill rolling, coil slitting and coil finishing and
annealing at Novelis Kingston located in Ontario,
Canada.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis North America - Kingston
CERTIFICATION SCOPE	Cold mill rolling, coil slitting and coil finishing and annealing at Novelis Kingston located in Ontario, Canada.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Material Conversion (Production and Transformation)
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">4 - 6 April 2023
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">3 August 2023
AUDIT SCOPE	<p>The audit scope includes the Kingston Works mill in Kingston, Ontario as part of the Novelis North America Automotive Value Stream.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Material Conversion (Production and Transformation) <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.

The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD 25 October 2023 – 24 October 2026

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 25 April 2025

CERTIFICATE NUMBER 317

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented an adequate system to monitor and comply with the applicable legal requirements through the use of procedures and worksheets to demonstrate compliance with legal requirements.
1.2 Anti-Corruption	Conformance	The Entity has implemented a Code of Conduct, including principles relevant to environmental, social, and governance performance. For more information refer to: https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct, including principles relevant to environmental, social, and governance performance. The Code of Conduct is available at: https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented Policies consistent with environmental, social, and governance practices. For more information refer to: https://www.novelis.com/?s=policy&post_type=page
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has implemented a document control system, and Environmental, Social, and Governance policies were signed and acknowledged by senior management. It was demonstrated that senior management provides support through the availability of resources and periodic reviews of policies. The Policies are available on the Novelis website: https://www.novelis.com/?s=policy&post_type=page
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity provides training to employees on the Environmental, Social, and Governance policies with annual refreshers. The policies are posted throughout the Facility. More information is available at: https://www.novelis.com/?s=policy&post_type=page
2.2 Leadership	Conformance	The Entity has assigned one senior Management Representative who has the overall responsibility

CRITERION	RATING	COMMENT
		and authority for ensuring conformance with the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has established a Documented Environmental and Social Management System (ESMS) comprising of environmental and social policies, procedures and Records and holds a valid ISO 14001 certificate. More information is available at: https://www.novelis.com/certifications
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has defined and documented a Social Management System as part of the Social Responsibility Policy. More information is available at: https://www.novelis.com/about-us/people
2.4 Responsible Sourcing	Conformance	The Entity has implemented a Responsible Purchasing Policy and a Code of Conduct for Suppliers covering environmental, social, and governance issues. More information is available at: https://www.novelis.com/suppliers
2.5 Impact Assessments	Conformance	The Entity has implemented a Responsible Purchasing Policy and a Code of Conduct for Suppliers covering environmental, social, and governance issues as part of their impact assessments. More information is available at: https://www.novelis.com/suppliers
2.6 Emergency Response Plan	Conformance	The Entity has established a site Emergency Response Plan with emergency evacuation drills, and firefighting equipment. The communication plan pre-establishes lines of communication to alert and deploy first responder team members to an incident.
2.7 Mergers and Acquisitions	Conformance	Any merger and/or acquisition activities at the Entity are managed by Novelis Corporate. More information is available at: https://www.novelis.com/?s=mergers
2.8 Closure, Decommissioning and Divestment	Conformance	Any closure, decommissioning, and divestment activities at the Entity are managed by Novelis Corporate. More information is available at: https://www.novelis.com/?s=mergers
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Novelis Sustainability Report 2022 is available on the website, which also includes information on corporate sustainability goals: https://www.novelis.com/sustainability

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3.2 Non-compliance and liabilities	Conformance	The Entity does not have any non-compliances or liabilities. Any fines, sentences, penalties, and sanctions are publicly disclosed at the Environmental Registry of Ontario: https://ero.ontario.ca
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only makes or has made on its behalf, payments to governments on a legal and/or contractual basis as required according to the Code of Conduct. More information is available at: https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented accessible, transparent, understandable and gender- and culture-sensitive grievance mechanisms suitable for dealing with grievances, grievances, and requests for information. Stakeholders can contact any Novelis corporate communications leader. Any complaints and grievances can be communicated via email or site leadership.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has assessed the impacts of the life cycle of all its main processes and is prepared for the Aluminum Association which is relevant to the Entity's products and lifecycle. For more information refer to: https://www.aluminum.org
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity publicly discloses the environmental Life Cycle Assessment (LCA) through the report prepared by the Aluminum Association relevant to the Entity's products and includes results in terms of cradle-to-gate and cradle-to-grave potential environmental impacts. More information is available at: https://www.aluminum.org
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity publicly discloses the environmental LCA through a report prepared by the Aluminum Association relevant to the Entity's products. More information is available at: https://www.aluminum.org
4.2 Product design	Conformance	The Entity supports the closed-loop process with their customer and the design process is shared between them. Other design responsibilities are handled by Novelis Corporate.

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4.3a Aluminium Process Scrap (targets)	Conformance	The Entity's scrap recovery overview includes batch annealing with scrap and is part of the Closed Loop process that has 100% scrap recovery, for other processes that produce scrap current target is 80%. More information is available at: https://www.aluminum.org
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity's plant-level scrap separation process includes alloy recycle percentage to prime alloy percentage.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has implemented a recycling strategy, which includes specific timelines, activities, and targets.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity has established a recycling strategic plan and is engaged with local, regional, or national collection and recycling systems to support accurate measurement and efforts to increase recycling rates for their Products containing Aluminium.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity accounts for and publicly discloses Material Greenhouse Gases (GHG) emissions and energy use by source annually on the CDP Climate Change platform.
5.2 GHG emissions reductions	Conformance	The Entity's annual GHG energy and emissions targets are publicly disclosed within the sustainability reports and corporate annual reports. The goal is to reduce the timebound target of 31% GHG and reduce the energy by 25%, other goals include the Car-to-Car Recycling program, zero carbon cars, and low carbon aluminium.
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity quantifies and reports emissions to the atmosphere that have adverse effects on humans or the environment. A report of air emissions is submitted to the Ministry of Environment. This information is available to the public via the

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		information request process. A summary of the air emissions is provided in the ASI Spotlight section of the 2022 Sustainability Report. More information is available at: https://www.novelis.com/sustainability
6.2 Discharges to Water	Conformance	The Entity has completed an assessment of the main risk areas of operations where Spills and Leakages can contaminate the air, water and/or soil and reported water discharges to the local authority. Environmental Aspects/Safety HIRARC Inventory, demonstrating that the water discharge, when undertaken, is properly treated by the effluent treatment system, meeting the pre-defined parameters. The Entity reports water discharges to the City of Kingston.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has undertaken an assessment of the main risk areas where Spills and Leakages can contaminate the air, water and/or soil through the Spill Prevention, Control and Response Performance Standard procedure.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has implemented a management plan and external communication, compliance controls and monitoring program to prevent and detect these Spills and Leakages through the Spill Prevention, Control and Response Performance Standard procedure. No spill situation that has caused any kind of impact has been identified.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has implemented the management plan and external communication, compliance controls and monitoring program to prevent and detect these Spills and Leakages through the Spill Prevention, Control and Response Performance Standard procedure. No Material Spills have occurred on the site that required reporting to an external agency. Any reportable Spills are disclosed to the Ontario Environmental Property Information Program: https://www.ontario.ca/page/environmental-property-information-program
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has implemented the management plan and external communication through the Spill Prevention, Control and Response Performance Standard procedure. No Spill situation was identified, which caused any type of impact and need for external communication.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a waste management strategy that is designed in accordance with the

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		Waste Mitigation Hierarchy through the Waste Management Program procedure. The Entity has developed a Waste Inventory Report that includes Hazardous and Non-Hazardous Waste. https://www.novelis.com/sustainability
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has implemented a waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy through the Waste Management Program procedure. The Entity has publicly disclosed all the amounts of Hazardous and Non-Hazardous Waste generated is included in the Sustainability Report 2023, page 59: https://www.novelis.com/sustainability/scaling-circularity
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

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6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has identified and mapped water use by source and type. The Water Balance includes water withdrawal, showing consumption, discharge, and consumption.
7.1b Water assessment (risk assessment)	Conformance	The Entity evaluated the risks related to water in Watersheds within their Area of Influence, through the Report Watershed Assessment, and the data for risk assessment was extracted from WRI (https://www.wri.org/aqueduct). The result of the Risk Assessment related to water in Watersheds in the Entity's Area of Influence is low.
7.2a Water management (management plans)	Conformance	The result of the Risk Assessment related to water in hydrographic basins in the Entity's Area of Influence is low, however, the Entity monitors the results monthly and the corporate goals regarding water use are included in the Sustainability Report: https://www.novelis.com/sustainability/scaling-circularity
7.2b Water management (monitoring)	Conformance	The result of the Risk Assessment related to water in hydrographic basins in the entity's Area of Influence is low. The Entity monitors the results and corporate goals for the use of water monthly.
7.3 Disclosure of water usage and risks	Conformance	The Entity evaluated the risks related to water in Watersheds in their Area of Influence, via the Watershed Assessment Report and from the 'Novelis Inc. CDP Water Security Questionnaire 2022'. More information is available at: https://www.novelis.com/sustainability
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has assessed the risks related to the materiality of impacts on Biodiversity from land use and activities in the Entity's Area of Influence through an Ecological Footprint Report. The report provides a summary of the site's regional ecology.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has evaluated the risks of local activities on Biodiversity and appropriate and preventive

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		<p>action plans were developed in the Biodiversity Risk Assessment data sheet.</p> <p>The Entity's third party biodiversity assessment is used to develop future action plans with time-bound targets.</p>
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	<p>The Entity has assessed the risks related to the Materiality of impacts on biodiversity from land use and activities in the Entity's Area of Influence through the Ecological Footprint. The report provides a summary of the site's regional ecology. The Entity has evaluated the risks of local activities on biodiversity and appropriate and preventive action plans were developed in the Biodiversity Risk Assessment data sheet.</p> <p>Arcadis third party assessment with Novelis includes areas where they use the biodiversity assessment with land acquisition and reporting.</p>
8.2c Biodiversity management (reporting)	Conformance	<p>The action plan demonstrates that the Entity has established positive impact actions for the improvement and conservation of biodiversity. The Entity will publicly disclose outcomes in the next edition of the Sustainability Report: https://www.novelis.com/sustainability/scaling-circularity</p>
8.3 Alien Species	Conformance	<p>The Entity has assessed the risks related to the Materiality of impacts on biodiversity from land use and activities in the Entity's Area of Influence through the Ecological Footprint, the report provides a summary of the site's regional ecology. Evidenced that during the assessment, no impacts on Biodiversity that need remediation were identified, the action plan developed demonstrates that the Entity establishes positive impact actions for improvement, conservation, and prevention of accidental or deliberate introduction of Alien Species that may have significant adverse impacts on biodiversity, and the Entity will make the public disclosure in the next edition of the Sustainability report.</p>
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to "No Go" in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

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8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has a commitment to Human Rights by adhering to the UN Global Compact in 2011 and through the Code of Conduct disclosed to all Workers and suppliers. More information is available at: https://www.novelis.com/wp-content/uploads/2021/10/Novelis-Code-of-Conduct-October-2022-ENG.pdf
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has developed an Environmental and Social Due Diligence process for Human Rights to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has developed the Environmental and Social Due Diligence of Human Rights to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights. The Entity does not demonstrate that it has caused or contributed to adverse impacts on Human Rights.
9.2 Women's Rights	Conformance	The Entity has implemented a Working Committee to ensure respect for the rights and interests of women, in accordance with international standards, including the United Nations Convention on the Elimination of All Forms of Discrimination Against Women. More information is available at: https://www.youtube.com/watch?v=erylpgRTVksNovelis The Entity is committed to increasing women in the workplace by 35%.
9.3 Indigenous Peoples	Conformance	The Entity has implemented the Land Acquisition, Resettlement and Livelihood Restoration Policy, to ensure respect for the rights and interests of Indigenous Peoples, in accordance with international standards, including ILO Convention 169 and the United Nations Declaration on the Rights of Indigenous Peoples, after mapping the indigenous communities.
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	The Entity has implemented the Land Acquisition, Resettlement and Livelihood Restoration Policy, to

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		ensure that New Projects or major changes to existing projects may have significant impacts on Indigenous Peoples culturally associated with and living on the relevant lands.
9.5 Cultural and sacred heritage	Conformance	<p>The Entity has implemented a Land Acquisition, Resettlement and Livelihood Restoration Policy, relevant to when New Projects or Major Changes to existing projects may have significant impacts on Indigenous Peoples culturally associated with and living on the relevant lands.</p> <p>The Entity in consultation with the affected Communities always cooperates to identify cultural or sacred heritage sites and values within the Area of Influence and take appropriate measures to avoid or remedy the impacts, as well as to guarantee continued rights of access to such sites or values.</p>
9.6a Resettlements (avoid or minimise)	Conformance	<p>The Entity has implemented the Land Acquisition, Resettlement and Livelihood Restoration Policy, to ensure that when New Projects or major changes to existing projects may have significant impacts on Indigenous Peoples culturally associated and living on the relevant lands consider viable alternatives to avoid or minimise physical and/or economic displacement, while balancing environmental, social and financial costs and benefits, paying particular attention to impacts on the poor and vulnerable, including women.</p>
9.6b Resettlements (where unavoidable)	Conformance	<p>The Entity has implemented the Land Acquisition, Resettlement and Livelihood Restoration Policy, to ensure that when New Projects or major changes to existing projects may have significant impacts on Indigenous Peoples culturally associated and living on the relevant lands consider viable alternatives to avoid or minimise physical and/or economic displacement, while balancing environmental, social and financial costs and benefits, paying particular attention to impacts on the poor and vulnerable, including women.</p>
9.7a Local Communities (rights and interests)	Conformance	<p>The Entity has implemented the Land Acquisition, Resettlement and Livelihood Restoration Policy, to respect the legal and customary rights and interests of Local Communities in their lands and livelihoods and the use of natural resources. More information is available at: https://www.novelis.com/about-us/community-outreach</p>

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9.7b Local Communities (impacts)	Conformance	The Entity has implemented the Land Acquisition, Resettlement and Livelihood Restoration Policy, to respect the legal and customary rights and interests of Local Communities in their lands and livelihoods and the use of natural resources. More information is available at: https://www.novelis.com/about-us/community-outreach
9.7c Local Communities (livelihoods)	Conformance	The Entity has implemented the Land Acquisition, Resettlement and Livelihood Restoration Policy, to respect the legal and customary rights and interests of Local Communities in their lands and livelihoods and the use of natural resources. More information is available at: https://www.novelis.com/about-us/community-outreach
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has implemented the Novelis Supplier Code of Conduct and it does not contribute to armed conflicts or Human Rights abuses in Conflict-Affected and High-Risk Areas during the process of qualifying new suppliers, the Conflict Minerals Questionnaire is signed. For more information refer to: https://www.novelis.com/suppliers/rfx-process https://www.novelis.com/wp-content/uploads/2021/04/Novelis-Supplier-Code-of-Conduct-ENG-04292021.pdf
9.9 Security practice	Conformance	The Entity has a contracted and private security company, which respects the Human Rights of Workers in accordance with known security standards and good practices.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the rights of Workers to freely associate in Labour Unions, seek representation and join Workers' Councils without interference and in compliance with the National Labor Relations Act of the USA. More information is available at: https://www.nlrb.gov/guidance/key-reference-materials/national-labor-relations-act
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of Workers to freely associate in Labour Unions, seek representation and join Workers' Councils without interference and in compliance with the National Labor Relations Act of the USA. More information is available at: https://www.nlrb.gov/guidance/key-reference-materials/national-labor-relations-act

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10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable to the Entity, as there are no restrictions on Freedom of Association and Right to Collective Bargaining in Canada.
10.2a Child Labour (minimum age)	Conformance	The Entity implements and adheres to the UN Global Compact, which expresses the commitment to respect Human Rights, where Child Labour must not be used. More information is available at: https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf
10.2b Child Labour (hazardous)	Conformance	The Entity implements and adheres to the UN Global Compact, which expresses the commitment to respect Human Rights, where Child Labour must not be supported or used. More information is available at: https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf
10.2c Child Labour (worst forms)	Conformance	The Entity implements and adheres to the UN Global Compact, which expresses the commitment to respect Human Rights, where Child Labour must not be supported or used. More information is available at: https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf
10.3a Forced Labour (human trafficking)	Conformance	The Entity implements and adheres to the UN Global Compact, which expresses the commitment to respect Human Rights. The Entity does not engage in, nor support trafficking of persons directly or through any employment or recruitment agency. More information is available at: https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity implements and adheres to the UN Global Compact, which expresses the commitment to respect Human Rights. The Entity does not require any form of deposit, recruitment fee, or equipment advance from Workers, directly or through employment or recruitment agencies. More information is available at: https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf
10.3c Forced Labour (migrant workers)	Conformance	The Entity implements and adheres to the UN Global Compact, which expresses the commitment

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		<p>to respect Human Rights. The Entity does not require any form of deposit, recruitment fee, or equipment advance from Workers, directly or through employment or recruitment agencies. More information is available at: https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf</p>
10.3d Forced Labour (debt bondage)	Conformance	<p>The Entity implements and adheres to the UN Global Compact, which expresses the commitment to respect Human Rights, The Entity does not hold Workers in Debt Bondage or force them to work to pay off a debt. More information is available at: https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf</p>
10.3e Forced Labour (freedom of movement)	Conformance	<p>The Entity implements and adheres to the UN Global Compact, which expresses the commitment to respect Human Rights. The Entity does not unreasonably restrict the freedom of movement of Workers in the workplace or housing on the premises. More information is available at: https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf</p>
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	<p>The Entity implements and adheres to the UN Global Compact, which expresses the commitment to respect Human Rights, The Entity does not keep original copies of Workers' identity documents, work permits, travel documents or training certificates. More information is available at: https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf</p>
10.3g Forced Labour (freedom to terminate employment)	Conformance	<p>The Entity implements and adheres to the UN Global Compact, which expresses the commitment to respect Human Rights. The Entity does not deny Workers the freedom to terminate their employment contract at any time, without penalty, upon reasonable notice. More information is available at: https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf</p>
10.4 Non-Discrimination	Conformance	<p>The Entity has developed the Equal Employment Opportunity and Discrimination and Harassment Free Workplace Policies to ensure equal</p>

CRITERION	RATING	COMMENT
		<p>opportunities and not support Discrimination in the hiring, salary, promotion, training, promotion opportunities or termination of any Worker based on gender, race, or national origin. or social status, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age or any other condition that may give rise to Discrimination. More information is available at: https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf</p>
10.5 Communication and engagement	Conformance	<p>The Entity has established Equal Employment Opportunity and Discrimination and Harassment Free Workplace Policies to ensure open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of work and compensation issues, without the threat of reprisal, intimidation or harassment. More information is available at: https://www.novelis.com/sustainability</p>
10.6 Disciplinary practices	Conformance	<p>The Entity has developed a Workplace Violence Prevention Program Standard to ensure that it does not engage in, nor tolerate the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence, including sexual harassment or verbal abuse of Workers.</p>
10.7a Remuneration (living wage)	Conformance	<p>The Entity has developed an Employee Compensation Standard to ensure Workers' Rights to a minimum wage and ensure that wages paid monthly, and annually updated through the Hourly Wage Increase History Table must be sufficient to meet Workers' basic needs.</p>
10.7b Remuneration (method of payment)	Conformance	<p>The Entity has developed an Employee Compensation Standard to ensure Workers' rights to a minimum wage and ensure that wages paid monthly, and annually updated through the Hourly Wage Increase History Table must be sufficient to meet Workers' basic needs.</p>
10.8 Working Time	Conformance	<p>The Entity has developed the Employee Compensation Standard to ensure Workers' Rights to a working day that complies with local legislation, including Overtime, holidays and paid annual vacations.</p>

CRITERION	RATING	COMMENT
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity is certified under the ISO 45001 Standard, with the elaboration of an Integrated System Policy, approved by the Senior Management and made available in the Internal System and publicly disclosed on the Entity's website. More information is available at: https://www.novelis.com/certifications
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The EHS policy is posted throughout the Facility and communicated to employees, contractors, and Visitors. The policy is also part of new hire orientation. The Entity is certified in the ISO 45001 Standard, with the elaboration of an Integrated System Policy, approved by the Senior Management and made available in the Internal System and publicly disclosed on the Entity's website and all Workers are trained during the process of integration to work. More information is available at: https://www.novelis.com/certifications
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity is certified under the ISO 45001 Standard, with the elaboration of an Integrated System Policy according to international standards and ILO Conventions on Occupational Health and Safety (OH&S), approved by the Senior Management and made available in the Internal System and publicly disclosed on the Entity's website. More information is available at: https://www.novelis.com/certifications
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has developed several safety tools, including a 'Duty of Refusal' tool, in which employees must understand the dangers and safe practices of their work and the authority to refuse or interrupt unsafe work. The Entity is ISO 45001 certified: https://www.novelis.com/suppliers/safety-absolutes
11.2 OH&S Management System	Conformance	The Entity has documented an OH&S Management System which is ISO 45001 certified as per applicable national and international standards. More information is available at: https://www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf
11.3 Employee engagement on health and safety	Conformance	The Entity's Workers participate in improving its culture of safety and awareness through their involvement in various committees. More information is available at: https://www.novelis.com/suppliers/safety-absolutes

CRITERION	RATING	COMMENT
11.4 OH&S performance	Conformance	The Entity assesses its performance in OH&S through indicators monitored by the Entity's board, seeking to improve the continuous improvement of its practices through periodically revised tools.

Document Control and Version History

Revision	Date	Notes
0	25 October 2023	Initial Certification Audit – Full Certification